

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON

Joseph J. Hesketh III,
*on his behalf and on behalf of other similarly
situated persons*

Plaintiff,

v.

Total Renal Care, Inc, on its own behalf and on
behalf of other similarly situated persons,

Defendants.

Case No: 2:20-cv-01733-JLR

DECLARATION OF CHRISTINA L.
HENRY IN SUPPORT OF OPPOSITION TO
MOTION FOR JUDGMENT ON THE
PLEADINGS

1. I am one of the attorneys of record for the Plaintiff herein. I have personal knowledge of the facts as stated herein and if called upon to testify to the truth thereof, I could and would do so.

2. Attached as Exhibit A is a true and correct copy of the transcript of the Deposition of Jeremy Michael Eaves taken on May 10, 2021 ("Eaves Deposition"). Relevant exhibits are also attached to the Eaves Deposition and referenced as follows:

Exhibit 20 from the Eaves Deposition (DAVITA_003368 – DAVITA_003373).

Exhibit 21 from the Eaves Deposition (DAVITA_003375 – DAVITA_003376).

Exhibit 23 from the Eaves Deposition (DAVITA_003131 – DAVITA_003137).

3. Attached as Exhibit B is a true and correct copy of the Errata Sheet to the Eaves Transcript.

4. Attached as Exhibit C is a true and correct excerpt of relevant documents production received from DaVita on May 10, 2021 in response to the Plaintiff's Subpoena Duces Tecum.

5. Attached as Exhibit D is a true and correct excerpt of the Deposition of Joseph J. Hesketh, III taken on May 13, 2021 (“Hesketh Deposition”). Relevant exhibits are also attached to the Hesketh Deposition excerpts and referenced as follows:

This Declaration is made under penalty of perjury under the laws of the State of Washington.

EXECUTED this July 12, 2021 at Bothell, Washington.

/s/ Christina L Henry
Christina L Henry, WSBA# 31273